

UNITED STATES BANKRUPTCY COURT, NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

RE: EDMOND E. PRYOR

) Case No. 17 B 32479  
)  
debtor ) Chapter 13  
)  
) Judge: JACQUELINE P COX

**NOTICE OF MOTION**

EDMOND E. PRYOR

DAVID M SIEGEL

via Clerk's ECF noticing procedures

3344 W. VAN BUREN #1ST FL  
CHICAGO, IL 60624

Please take notice that on September 16, 2019 at 10:00 am my designee or I will appear before the Honorable Judge JACQUELINE P COX at 219 South Dearborn Courtroom 680, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL 60603 or by the methods indicated on August 20, 2019.

/s/ Tom Vaughn

**TRUSTEE'S MOTION TO DISMISS FOR FAILURE TO TURNOVER TAX  
RETURN TO TRUSTEE**

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On October 30, 2017 the Debtor filed a petition and/or plan under Chapter 13 of Title 11 U.S.C.
2. The debtor's plan confirmed on February 26, 2018, provided for tax returns to be turned over to the trustee each year.
3. The trustee has not received the tax return or transcript for 2018.

WHEREFORE, the Trustee prays that this case be dismissed for material default by the debtor with respect to a term of a confirmed plan, pursuant to § 1307 (c) (6).

Respectfully submitted,

/s/ Tom Vaughn

TOM VAUGHN  
CHAPTER 13 TRUSTEE  
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